

# **EXHIBIT B**

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**From:** stuart.clements  
**Sent:** Wednesday, April 2, 2025 3:37 PM  
**To:** Press, Steven; Bishop, Tyler  
**Cc:** juan.vasquez; Emmanuel Almaraz; Armando Huereca; david.medina; peter.munk  
**Subject:** Beckman - April 2 Supplement Issue

**Importance:** High

Steve and Tyler,

I hope you are doing well. We are following up on the March 19 discovery conference. Per the Court's recommendation, Plaintiffs planned to provide another supplement today to include Ms. Beckman's therapy and mental health records. Unfortunately, we have encountered an unanticipated delay.

Ms. Beckman's therapist contacted our office from the hospital on Friday to inform us that she has suffered a medical emergency and is receiving inpatient care. She is a solo practitioner and, accordingly, no one else has access to her files or is in a position to compile the responsive records. She anticipated working on this on Saturday or Tuesday, but she has not been able to turn to our request due to her health issue.

Accordingly, we are requesting a brief extension to allow her sufficient time to produce the records once she is medically able. We remain committed to supplementing, and we will endeavor to provide these materials as soon as we receive them. We are requesting a one-week extension to April 9 for our responses.

We trust that, under the circumstances, you will agree that a short extension is warranted. If we must, we can provide our discovery responses without the requested medical records and supplement again, but in the interest of generating fewer supplements, we would appreciate an extension to provide all at once.

We are happy to set up a call this afternoon or later this week to discuss this or any other open items. Thank you for your consideration.



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